

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JUAN EDUARDO COLON MARRERO

DEBTOR

CASE NO. 22-00979/MCF

CHAPTER 13

**DEBTOR'S SECOND MOTION FOR EXTENSION OF TIME
TO REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 62**

TO THE HONORABLE COURT:

NOW COMES, JUAN EDUARDO COLON MARRERO, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On February 15, 2024, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 62, alleging that the Debtor has defaulted in his Plan payments in the sum of \$700.00.

2. On March 14, 2024, the Debtor met with his undersigned attorney and filed a *Motion for Extension of Time to reply to Trustee's Motion to Dismiss*, Docket No. 62, whereby the Debtor admitted to the Plan arrears and requested the Court for additional time within to cure the arrears in the confirmed Plan payments to the Chapter 13 Trustee, in the above captioned case.

3. That on March 18, 2024, the Court issued an *ORDER*, Docket No. 64, granting the Debtor's *Motion for Extension of Time*, due by April 13, 2024.

4. As of today April 11 2024, the Debtor has been unable to cure the Plan arrears. However, the Debtor is still in the process of obtaining the monies to cure the Plan arrears, in the present case.

5. The Debtor respectfully requests additional time of fourteen (14) days within to resolve this matter in order to adequately reply to *Trustee's Motion to Dismiss*, Docket No. 62. This extension of time to expire on April 25, 2024.

WHEREFORE, the Debtor, through the undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to his address of record.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 11th day of April, 2024.

/s/Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY for the DEBTOR
PO BOX 186 CAGUAS PR 00726
TEL NO 787- 744-7699/787-963-7699
Email: rfc@rfigueroalaw.com